

REMARKS

The Examiner is thanked for the thorough examination of the above-referenced patent application and the reconsideration/withdrawal of the prior rejections. The Office Action, however, has continued to reject all examined claims 12, 13, and 22 on new grounds. Specifically, the Office Action has now rejected independent claim 12 as allegedly unpatentable over Choi (US 6,806,645) in view of Koshio (US 6,522,075). The Office Action has also rejected independent claim 12 as allegedly unpatentable over Choi (US 6,806,645) in view of Harada (US Pub. No. 2003/0132709). For at least the reasons set forth below, Applicants respectfully request reconsideration of these rejections.

Objection to the Drawings

The drawings have been objected to under 37 C.F.R. 1.121(a) because the way figure 2A is drawn it is not clear what is on the rear and front substrate. Corrected drawing sheets in compliance with 37 C.F.R. 1.121(a) are submitted in this response, clearly marking what is on the rear and front substrate in FIG. 2A.

In view of the above-noted amendments to the drawings, Applicants respectfully submit that the drawings are acceptable and respectfully request that the objection be withdrawn.

Interview Summary

An interview was held on Wednesday, April 30, at 1pm. The participants were Examiner Monica Lewis and Applicants' representative Cynthia L. Davis (Reg. No. 61,044). Differences between independent claim 12 and the Koshio and Harada references were discussed, specifically the absence of "a first pattern comprising one line segment isolated from the bus electrode", as is recited in claim 12, in either of the references. The Examiner indicated that Applicants' arguments would be carefully considered if presented in a response. Applicants would like to thank the Examiner for her time.

Rejections under 35 U.S.C. 103(a)

1. Independent claim 12

As noted above, the Office Action rejected independent claim 12 under 35 U.S.C. 103(a) as allegedly unpatentable over Choi (US 6,806,645) in view of Koshio (US 6,522,075); and also as allegedly unpatentable over Choi (US 6,806,645) in view of Harada (US Pub. No. 2003/0132709). To the extent the grounds of the rejection may be applied to claims now pending in this application, the rejections are respectively traversed.

Claim 12 recites the features “**a first pattern comprising at least one line segment isolated from the bus electrode**” and “**wherein the projection of the line segment is substantially parallel to at least one side of the hexagonal honeycomb pattern with a predetermined distance therebetween**”. The Office Action admits on page 3 that the above-emphasized claim features are not disclosed in Choi, but alleges that it is disclosed in Koshio, FIG.

17. However, Koshio states in column 7, lines 33-37,

Each row electrode X includes a plurality of T-shaped transparent electrodes Xa consisting of a transparent elec- Further, a white color dielectric layer **14** is formed on the electrically conductive film made of ITO, and an elongated bus electrode Xb consisting of a metal film which is connected with one end of each T-shaped transparent electrode Xa.

Koshio further states in column 13, lines 11-14:

Moreover, T-shaped transparent electrodes Xo1a, Yo1a of row electrodes Xo1, Yo1 have head portions Xo1a', Yo1a' which are inclined with respect to the displaying lines Land are facing each other with gaps g" formed therebetween.

The Office Action appears to equate the transparent electrode of Koshio with the line segment recited in claim 12. However, even assuming, *arguendo*, the equivalency alleged by the Office Action, in Fig. 1 of Koshio, the elongated bus electrode (Xb) clearly shown to be connected to the T-shaped transparent electrode (Xa) (first pattern). Therefore, Koshio does not teach, disclose, or suggest **a first pattern comprising at least one line segment isolated from the bus electrode**, as is recited in claim 12. Also, in Fig. 17 of Koshio, the gap (g") is

formed between the transparent electrodes (first patterns) rather than formed between the first pattern (transparent electrode) and the hexagonal honeycomb pattern (partition wall).

Therefore, Koshio does not teach, disclose, or suggest ***wherein the projection of the line segment is substantially parallel to at least one side of the hexagonal honeycomb pattern with a predetermined distance therebetween***, as is recited in claim 12.

Further, the Office Action admits on page 5 that the above-emphasized claim features are not disclosed in Choi, but alleges the features are disclosed in Harada, FIGs. 14 and 18. The Office Action appears to equate the transparent electrode of Harada with the line segment recited in claim 12. Harada states in paragraph 81:

On the other hand, the plurality of second electrodes 22 are formed on a main surface of the second substrate 21 (on the side of the first substrate 11) and aligned in the first direction v. The second electrodes 22 each include a metal auxiliary electrode (also referred to as "bus electrode") 221 and a plurality of transparent electrodes 222 connected to the metal auxiliary electrode 221, projecting in the first direction v.

The transparent electrodes 222 (first pattern) taught by Harada are connected to the metal auxiliary electrode 221 (bus electrode). Therefore, even assuming, arguendo, the equivalencies alleged by the Office Action, Harada does not teach, disclose, or suggest "***a first pattern comprising at least one line segment isolated from the bus electrode***" and "***wherein the projection of the line segment is substantially parallel to at least one side of the hexagonal honeycomb pattern with a predetermined distance therebetween***" as is recited in claim 12.

Therefore, for at least these reasons, Applicants submit that independent claim 12 is patentable over Choi in view of Koshio, and over Choi in view of Harada, and respectfully requests that the rejections of the claims be withdrawn.

2. Dependent claims

The Office Action rejected claim 13 under 35 U.S.C. 103(a) as allegedly unpatentable over Choi in view of Koshio in further view of Hirano (US Patent 6,819,046). Applicant respectfully

traverses the rejections. Specifically, claim 13 patently defines over the combination at least by virtue of its dependency from claim 12.

The Office Action also rejected claim 22 under 35 U.S.C. 103(a) as allegedly unpatentable over Choi in view of Koshio in further view of Boo (Korean Publication No. 2002019353). Applicant respectfully traverses the rejections. Specifically, claim 22 patently defines over the combination at least by virtue of its dependency from claim 12.

Accordingly, applicant respectfully submits that the cited references fail to disclose all the limitations of claim 12. Therefore, claim 12 is allowable over the cited references. Insofar as claims 13 and 22 depend from claim 12, these claims are also allowable.

Further, although claims 14-21 have tentatively been withdrawn from consideration, with the allowance of claim 12, the Examiner should consider and allow claims 14-21.

CONCLUSION

It is not believed that extensions of time or fees for net addition of claims are required, beyond those which may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required therefor (including fees for net addition of claims) are hereby authorized to be charged to deposit account no. 20-0078.

Respectfully submitted,

/Daniel R. McClure/

By:

Daniel R. McClure
Reg. No. 38,962

THOMAS, KAYDEN, HORSTEMEYER & RISLEY, L.L.P.
600 Galleria Parkway
Suite 1500
Atlanta, Georgia 30339-5948
(770) 933-9500